

EXHIBIT G

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF BORIS BRONSHTEYN

I, Boris Bronshteyn, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at the World Trade Center Towers when the terrorist attacks of the occurred.

4. I was employed by ABM Industries, Inc.

5. I was in New York City working as a mechanical engineer on Level B-6 in the basement in the mechanical room, which is located between the two towers at Ground Zero when the plane(s) hit the towers. I received physical injuries in the escape and collapse. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen.

The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

6. Because of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: a broken shoulder, severe and crippling emotional trauma, anxiety, and severe sleeping issues. According to Dr. Max Brandt, whose office was located at 35 East 38th Street, NY, NY 10016, I am totally and permanently psychiatrically disabled.

7. My anxiety and severe depression caused by the September 11th terror attacks have dramatically altered my life since that terrible day. I was unable to sleep and can no longer drive or socialize or spend any significant time outside of my home. I very seldom leave my home now and continue to have problems talking to anyone and I get very upset and nervous when asked questions about that day.

8. I am now a survivor of two separate terrorist attacks, as I was also working in the World Trade Center during the 1993 bombing which has contributed to the severe trauma, depression and anxiety I still suffer from. My best friend who was working with me on 9-11 died while I was holding his hand. These two catastrophic events have affected me profoundly and I continue to suffer from severe and extreme anxiety and depression to this day.

9. I sought medical attention for my injuries. Attached as Exhibit B to this Declaration is a true and correct copy of select medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

10. I suffered, and continue to suffer, severe and traumatic emotional distress because of the above terrorist attacks. I suffered and continue to suffer from traumatic anxiety and depression due to the traumatic events of these terrorist attacks. I also continue to receive treatment for my severe emotional distress.

11. I previously pursued a claim (Claim Number unknown) through the September 11th Victim Compensation Fund (VCF) specifically related to my injuries incurred on September 11, 2001. However, due to the extreme emotional damage that I experienced because of these terrorist attacks and the atrocities that I witnessed that day, I was unable to assist with the completion of my VCF claim form materials. Thus, my VCF claim was ultimately withdrawn from consideration.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this ____ day of December 2019.

Boris Bronshteyn 12/23/19
Signature of Declarant – Boris Bronshteyn

Exhibits Filed Under Seal